

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

CHRISTIAN ALBERTO SANTOS GARCIA,
et al.,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, in his official
capacity as Secretary, U.S. Department of
Homeland Security, *et al.*,

Defendants.

Case No. 1:20-cv-00821 (LBM/JFA)

**JOINT STIPULATION OF PLAINTIFFS AND DEFENDANTS IMMIGRATION
CENTERS OF AMERICA – FARMVILLE, LLC AND JEFFREY CRAWFORD**

COMES NOW Plaintiffs, Christian Alberto Santos Garcia, Santos Salvador Bolanos Hernandez, Gerson Amilcar Perez Garcia, Ismael Castillo Gutierrez, Didier Mbalivoto, Frank Odin Souza Bauer, Marco Antonio Miranda Sanchez, Melvin Ivan Velasquez Orellana, Olaitan Michael Olaniyi, Shawn Houslin, Jerbin Ivan Garcia Garcia, Jorge Alexander Rivera Rodriguez, Jose Linares Hernandez, and Vano Bazerashvili (the “Plaintiffs”), and Defendants Immigration Centers of America – Farmville, LLC and Jeffrey Crawford (the “Farmville Defendants”) (together, with Plaintiffs, “the Parties”), by and through undersigned counsel, hereby stipulate as follows:

1. By Joint Motion to Stay Briefing and Continue the Hearing on Motions for Summary Judgment Relating to Counts II and III (“Motion to Stay,” ECF No. 189), filed on July 23, 2021, the Parties notified the Court that they had resolved in principle all matters in this

litigation as between and among them and required a brief period of not more than 30 days to effectuate a settlement agreement.

2. By Order entered July 23, 2021 (ECF No. 190), the Court granted the Motion to Stay.

3. The Parties reached agreement on the form of a written settlement agreement on August 3, 2021 and informed the Court via a Notice filed on August 23, 2021 (ECF No. 191).

4. The Parties exchanged a fully executed settlement agreement on September 2, 2021.

5. Farmville Defendants fulfilled their obligations under Paragraph 1 of the Settlement Agreement on September 7, 2021.

6. Therefore, Plaintiffs agree to dismiss their claims against the Farmville Defendants with prejudice.

Pursuant to Federal Rule of Civil Procedure 41(a)(2), Plaintiffs respectfully request that this Court enter an Order dismissing their claims against the Farmville Defendants, with prejudice.

Dated: September 9, 2021

Respectfully submitted,

Joseph D. West (Va. Bar No. 16834)
David Debold (*pro hac vice*)
Naima L. Farrell (*pro hac vice*)
Thomas J. McCormac IV (*pro hac vice*)
Blair Watler (*pro hac vice*)
Katherine King (*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5306
Tel: 202-955-8551
jwest@gibsondunn.com
ddebold@gibsondunn.com
nfarrell@gibsondunn.com
tmccormac@gibsondunn.com
bwatler@gibsondunn.com
kking@gibsondunn.com

*Pro bono counsel for Plaintiff Christian
Alberto Santos Garcia*

By: /s/Simon Sandoval-Moshenberg
Simon Sandoval-Moshenberg
(Va. Bar No. 77110)
Kristin Donovan (Va. Bar No. 92207)
Granville Warner (Va. Bar No. 24957)
LEGAL AID JUSTICE CENTER
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Tel: 703-778-3450
simon@justice4all.org
kristin@justice4all.org
cwarner@justice4all.org

Sirine Shebaya (*pro hac vice*)
Amber Qureshi (*pro hac vice*)
Matthew Vogel (*pro hac vice*)
NATIONAL IMMIGRATION PROJECT OF THE
NATIONAL LAWYERS GUILD
2201 Wisconsin Avenue, N.W., Suite 200
Washington, D.C. 20007
Tel: 617-227-9727
sirine@nipnlg.org
amber@nipnlg.org
matt@nipnlg.org

*Pro bono counsel for Plaintiffs Santos Salvador Bolanos
Hernandez, Gerson Amilcar Perez Garcia, Ismael Castillo
Gutierrez, Didier Mbalivoto, Frank Souza Bauer, Marco
Antonio Miranda Sanchez, Melvin Ivan Velasquez Orellana,
Olaitan Michael Olaniyi, Shawn Houslin, Jerbin Ivan Garcia
Garcia, Jorge Alexander Rivera Rodriguez, Jose Linares
Hernandez, and Vano Bazerashvili*

By: /s/ John M. Erbach
John M. Erbach (VSB No. 76695)
Email: jerbach@spottsfain.com
Patricia Bugg Turner (VSB No. 72775)
Email: pturner@spottsfain.com
Kasey L. Hoare (VSB No. 92289)
khoare@spottsfain.com
Spotts Fain, P.C.
411 E. Franklin Street, Suite 600
Richmond, VA 23219
(804) 697-2000

(804) 697-2100 (Facsimile)

*Counsel for Defendants Jeffrey Crawford and
Immigration Centers of America - Farmville, LLC*

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on this date, I uploaded the foregoing, along with all attachments thereto, to this Court's CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all counsel of record.

Dated: September 9, 2021

Respectfully submitted,

By: s/ Simon Sandoval-Moshenberg
Simon Sandoval-Moshenberg
(Va. Bar No. 77110)
LEGAL AID JUSTICE CENTER
6066 Leesburg Pike, Suite 520
Falls Church, VA 22041
Tel: 703-778-3450
simon@justice4all.org